

EXHIBIT 2

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF MINNESOTA

3
4 Brock Fredin,

5 Plaintiff,

6 v.

No. 17-03058 (SRN/HB)

7 Lindsey Middlecamp,

8 Defendant.

9
10 Brock Fredin,

11 Plaintiff,

12 v.

No. 18-cv-00466 (SRN/HB)

13 Grace Elizabeth Miller and

14 Catherine Marie Schaefer,

15 Defendants.

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18 DEPOSITION OF BROCK FREDIN

19 Taken December 5, 2019

20 Scheduled for 9:30 a.m.

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25 REPORTED BY: JONATHAN WONNELL, RMR

1 Grace Miller. I looked at that conversation. I
2 looked at information related to everything that had
3 happened to determine if there was someone who made a
4 rape allegation against me. So, yeah, I mean, I was
5 at a loss.

6 (Fredin Exhibit 20 was marked for
7 identification.)

8 BY MR. BREYER:

9 Q Mr. Fredin, you've been handed Exhibit 20
10 and this is a post from you, correct?

11 A I'm not sure if it is.

12 Q And you appear to be complaining about
13 Ms. Middlecamp and what she has done with respect to
14 her CardsAgstHrsmt page, correct?

15 A It appears as if I am indicating that a
16 person that I had never met before is attacking me to
17 thousands of people on Twitter.

18 Q All right. And in the middle of the page
19 you list a number of complaints you have against her,
20 including the last one which says "Promoting false
21 rape accusations." Do you see that? And then after
22 that there's a parentheses and it says, "(from women
23 cheating on their fiancés in consensual intimacy)."

24 A Yes, I see that.

25 Q Which woman did you have consensual

1 intimacy that you're referring to?

2 A None.

3 Q Well, what women are you aware of that
4 were cheating on their fiancés?

5 A None. Literally, I've had sex with like
6 one woman. So --

7 Q Well, is this the woman?

8 A No.

9 Q Well, explain to me the reference about
10 women cheating on their fiancés in consensual
11 intimacy with you?

12 A I have honestly no idea. I've had sex
13 with one woman, this is horrible to say in a
14 deposition, but I'm gay, so this is not a reference
15 to any sort of sexual activity that I could have
16 possibly had with a woman.

17 Q Well, how do you explain the words you
18 used?

19 A Again, I have had sex with one woman in my
20 entire life and it was not this individual.

21 Q Well, Mr. Fredin, you've had --

22 A This is clearly a fake --

23 Q -- relationships with women. We've talked
24 about those. You had one with my client, Grace
25 Miller. You had one with Sarah -- I'm going to